

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WALTER BEICH

No. 15 CR 282

Judge John W. Darrah

**MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by ZACHARY T. FARDON, United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant with health care fraud, in violation of Title 18, United States Code, Section 1347 (Counts 1-9), and aggravated identity theft, in violation of Title 18, United States Code, Section 1028A (Counts 10-12)..
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendant, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

ZACHARY T. FARDON
United States Attorney

By: /s/ Samuel B. Cole
SAMUEL B. COLE
Assistant U.S. Attorney
219 South Dearborn St., Rm. 500
Chicago, Illinois 60604
(312) 353-4258

Dated: June 4, 2015